

EXHIBIT 3

to

DEFENDANT BUILD OUR CENTERS'
REPLY IN SUPPORT OF MOTION FOR
CASE MANAGEMENT CONFERENCE,
RESTRAINING ORDER, AND SANCTIONS

in re

Ribar vs. Washoe County, et alia
(Case No. 3:24-cv-00526)

**SEPTEMBER 22, 2025,
8:23 PM EMAIL RE
EVIDENCE PRESERVATION**

EXHIBIT 3

Alison Kertis

From: Const2Audit <const2audit@gmail.com>
Sent: Monday, September 22, 2025 8:23 PM
To: Alison Kertis; Jerry Carter
Cc: Liddell, Lindsay L; Burnett, Andrew Cobi
Subject: Re: Preservation and Identification Demand – September 17, 2025 Washoe County Library Board of Trustees Meeting

Categories: Filed to Clio

Dear Ms. Kertis,

This letter serves as a formal demand for preservation and identification under the Federal Rules of Civil Procedure and applicable ethical obligations.

On **September 17, 2025**, at the **Washoe County Library Board of Trustees meeting held at the Sparks Library**, two individuals, unknown to me, sat near me and trained a camera on me for the duration of the meeting. They repeatedly repositioned the camera to follow my movements, interrupted my public comment with name-calling, and made exaggerated gestures while “framing shots.” Most significantly, when I asked them directly whether they had participated in the creation of the **Build Our Center “banned list,”** the individuals twice admitted on camera that they had.

This incident was video-recorded by me and is preserved. Their statements constitute **admissions against interest** directly relevant to the claims in my lawsuit, particularly my allegations of a conspiracy to exclude political opponents from public events through the use of a banned list. Here is the video with the individuals and the admittance of participating in the “BANNED LIST” <https://youtu.be/lUxGnnouOrc>

Accordingly, I demand that you:

1. **Preserve all evidence:** Immediately preserve any video, audio, notes, or communications created by or involving these two individuals at the September 17, 2025 meeting. This includes all footage recorded by their camera. Destruction of this evidence will be treated as spoliation.
2. **Identify the individuals:** Confirm in writing whether these two individuals were acting on behalf of **Build Our Center, Inc.**, any related entity, or any of its officers, directors, agents, or volunteers. Provide their names and roles.
3. **Clarify scope of representation:** State whether your representation of Build Our Center extends to these individuals.

Please consider this a **litigation hold demand**. Failure to preserve and disclose this information may result in sanctions under Federal Rule of Civil Procedure 37(e) and an adverse inference instruction at trial.

For transparency, I am copying Ms. Liddell, as Washoe County officials were present at this public meeting and the County has an interest in ensuring the integrity of its proceedings.

I request a written response by **September 30, 2025**, so that I may address this matter in my forthcoming Second Amended Complaint and in discovery planning.

Respectfully,

/s/ Drew J. Ribar

Pro Se Plaintiff

Candidate for Nevada Assembly District 40